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Meeting Minutes Transmittal

Unit Managers' Meeting
183-H Solar Evaporation Basins
Federal Building, Room 784-B
Richland, Washington

Meeting Held March 6, 1995
From 1:00 to 4:00 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers' Meeting.

Jeffrey M. Bruggeman
Jeffrey M. Bruggeman, Unit Manager, RL

DATE: 10 Aug 95

Robert E. Cordts
Robert E. Cordts, Unit Manager, Washington State Department of Ecology

DATE: 7 Jun 95

183-H Solar Evaporation Basins Closure, Contractor Concurrence:

[Signature]
Contractor Representative, ERC

DATE: 7 June 95

Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following:

Attachment 1 - Agenda

Attachment 2 - Summary of Discussion and Commitments / Agreements

Attachment 3 - Attendance List

Attachment 4 - Action Items



Attachment 1**Unit Manager's Meeting
183-H Solar Evaporation Basins
Federal Building, Room 784-B
Richland, Washington****Meeting Held March 6, 1995
From 1:00 to 4:00 p.m.****Agenda****1. Approval of Past UMM Minutes**

- The January 1995 UMM minutes are presented for approval.

2. Status Open Action Items

- 09-20-94:2 Nitrate Cleanup Level
- 09-20-94:3 Hanford RCRA Permit Compliance Letter(s); conditions V.1.B.j and V.1.B.k
- 12-15-94:2 Method A versus Method B for arsenic cleanup
- 12-15-94:6 Continue developing closure proposal
- 12-15-94:7 Compare statistical guidance of Ecology's Toxics cleanup program to our current MTCA-based method
- 12-15-94:8 Cleanup level/extent method consistent with CERCLA
- 01-26-95:1 Groundwater Monitoring Compliance
- 01-26-95:2 Cleanup level for arsenic
- 01-26-95:3 Cleanup strategy for Operable Units
- 01-26-95:4 Listed Waste Letter
- 01-26-95:5 Disposal of basin rainwater

3. Closure Activities / Planning

- Schedule
- Decontamination process
- Rainwater / Listed Waste
- Groundwater Monitoring Compliance
- Summary of open and resolved issues

4. New Business**5. Set Next Meeting Date**

Attachment 2

**Unit Manager's Meeting
183-H Solar Evaporation Basins
Federal Building, Room 784-B
Richland, Washington**

**Meeting Held March 6, 1995
From 1:00 to 4:00 p.m.**

Summary of Discussion and Commitments / Agreements

1. ~~The January UMM minutes were presented for approval by the Unit Managers.~~

2. **Status Action Items**

- 09-20-94:2 Nitrate Cleanup Level
[Open for discussion.]

- 09-20-94:3 Hanford RCRA Permit Compliance Letter(s)
[This item is closed.]

- 12-15-94:2 Method A vs. Method B for Arsenic Cleanup
[B. Cordts to review..]

- 12-15-94:3 Comment on Closure Proposal
[This item is closed.]

- 12-15-94:6 Continue developing Closure Proposal
[B. Cordts has a copy of the closure proposal, but it has not been sent via transmittal letter from RL.]

- 12-15-94:7 Compare Statistical Guidance of Ecology's Toxics Cleanup Program to
our Current MTCA-based Method
[B. Cordts to review.]

- 12-15-94:8 Cleanup level /Extent Method Consistent with CERCLA
[It was decided to involve the CERCLA people in the discussion.]

- 01-26-95:1 Groundwater monitoring compliance
[This item is closed.]

-01-26-95:2 Cleanup level for arsenic

[B. Cordts to review.]

-01-26-95:3 Cleanup strategy for operable units

[N. Werdel stated she would pass out the cleanup strategy to all parties.]

-01-26-95:4 Listed Waste Letter

[R. Miller requested concurrence on the listed waste letter no later than March 31, 1995. B. Cordts and D. Duncan agreed to discuss the issue on March 13.]

-01-26-95:5 Disposal of basin rainwater

[R. Miller stated there was approximately 50,000 gallons of rainwater to be disposed. The concurrence of the listed waste letter would remove the listed waste concerns for the rainwater. The issue will be discussed by the Regulators on March 13.]

3. Status Closure Activities / Planning

- Schedule

[R. Miller passed out a copy of the current anticipated scheduled activities.]

- Decontamination Process

[R. Miller and J. Badden stated a decontamination procedure was in place for the equipment.]

- Rainwater / Listed Waste

[Discussed in full during the meeting.]

- Groundwater Monitoring Compliance

[J. Badden stated that Westinghouse Hanford Company had not been in compliance for monitoring in accordance with the permit. WHC was using best management practices by not monitoring unaffected wells outside the plume. WHC is back in compliance.]

4. New Business

- Residue Sampling

[B. Cordts stated that he was concerned that there was not a sampling analysis plan for the contaminated residue resulting from the removal of 6 mm of concrete in the basins. B. Cordts was concerned about elevated vanadium levels, even though they are below regulatory concerns. B. Cordts stated that he agreed with the decontamination procedure, but was concerned with characterization of the scabbled dust. It was discussed that vanadium was high in the background levels. The issue is to be investigated.]

5. Set Next Meeting Date

[The next meeting is tentatively planned for April 11, 1995, 1:00 to 4:00 p.m., at the Federal Building, Teleconferencing Room, Richland, Washington.]

**Pre-Unit Manager's Meeting
183-H Solar Evaporation Basins
Federal Building, Room 784-B
Richland, Washington**

Attendance List

[illegible]

Attachment 4

**Unit Manager's Meeting
183-H Solar Evaporation Basins
Federal Building, Room 784-B
Richland, Washington**

**Meeting Held March 6, 1995
From 1:00 to 4:00 p.m.**

Open Action Items

<u>Action Item #</u>	<u>Description</u>
09-20-94:2	Ecology will provide means to produce a direct soil exposure nitrate cleanup level, assuming that the value calculated from WAC 173-340-740(3)(a)(ii) is unacceptable. - B. Cordts to review and comment.
12-15-94:2	Ecology: Since the MTCA method B arsenic cleanup level is less than background, can we use the Method A, which is based on state background? -B. Cordts to review and comments.
12-15-94:6	ERC: Continue development of closure proposal.
12-15-94:7	ERC: Compare statistical guidance of Ecology, from Toxics Cleanup Program with our current MTCA-based method. B. Cordts to review and comment.
12-15-94:8	ERC: Make sure that our cleanup level / extent method is consistent with CERCLA.
01-26-95:2	Cleanup level for arsenic. B. Cordts to concur.
01-26-95:3	Cleanup strategy for operable units. N. Werdel to issue copies.
01-26-95:4	Listed Waste Letter. Ecology/EPA need concurrence.
01-26-95:5	Disposal of basin rainwater. Concurrence of the listed waste letter. J. Badden is working with Dan Duncan for concurrence. Water has been analyzed and the data is being reviewed by ERC for recommendation.

03-06-95:1

ERC will investigate the vanadium levels.

Closed Action ItemsAction Item #Description

03-02-93:1

WHC will make a proposal for closure of the 183-H basins that will include a new closure date.

As a result of contractor change, this action is conferred to ERC.

08-18-94:1

ERC will issue a letter requesting that the concrete be released from consideration as listed waste. Due September 1, 1994.

09-20-94:1

Ecology will evaluate debris rule compliance of 6 mm basin concrete removal with a fractional area of resistant aggregate protruding above the 6 mm level.

~~This Action Item is CLOSED (November 1, 1994).~~

09-20-94:3

ERC will provide letter(s) addressing compliance with the Hanford Facility RCRA Permit conditions (V.I.B.g, V.I.B.j, and V.I.B.k).

09-20-94:4

Ecology will review the 183-H Data Evaluation Report.

12-15-94:1

Ecology: Are the statistics of WAC 173-340-740(7)(d) applicable to MTCA cleanup levels?

12-15-94:3

Ecology: Comment on existing stage of closure proposal, with particular focus on our recommendations for cleanup levels / strategy for constituents without MTCA method B cleanup levels.

12-15-94:4

ERC: Have staff toxicologist review the nitrate cleanup level produced by WAC 173-340-740(3)(a)(iii) and propose direct soil cleanup level and rational.

12-15-94:5

ERC: Finalize Data Evaluation Report and submit final by March 28, in order to satisfy the Hanford RCRA Permit condition V.I.B.g and V.I.B.j. Closed. See 09-20-94:3

01-26-95:1

Groundwater monitoring compliance. J. Badden/R. Miller

We are not presently in compliance with the permit. Working with Mary Hartman and Legal for immediate compliance and proposing a new monitoring plan.

RESOLVED ISSUES

- An appropriate oral RFD for silver is 0.005 mg/(kg*day).
- The Debris Rule will be applied to 183-H basin concrete.
- It is appropriate to use the MTCA method A for cleanup level for lead.

OPEN ISSUES

- Action Items in Unit Managers Meeting minutes
- RCRA/CERCLA integration of soil closure activities
- Re-validation of vadose zone data
- Listed Waste Letter: Dangerous waste designation of concrete surface zone, and soil?
- Cleanup level for nitrate (pending, Ecology)
- Finalization/approval of closure proposal will address:
 - i. Selection of closure option (modified or clean)
 - ii. Use of existing data to support closure options
 - Concrete: Remediation relies on Debris Rule, not data
 - Vadose Zone Data: Has been validated (some adjustments possible)
 - Shallow Soil Data
 - iii. Soil Closure
 - Cleanup level for sulfate, arsenic
 - Confirmatory sampling requirements
- It is tentatively assumed that groundwater in the 100 Areas will not be used for direct human consumption. This is the basis for the proposed soil-ingestion based cleanup levels. Remediation based on these levels will not preclude further remedial action that may follow if site usage accommodates groundwater usage.

DISTRIBUTION

J. W. Badden	BHI	H4-86
J. K. Bartz	GSSC	R3-82
R. E. Cordts	Ecology - Lacey	
L. D. Dillon	BHI	H6-29
D. L. Duncan	EPA - Seattle	HW-106
P. W. Griffin	CHI	X5-53
C. W. Hedel	BHI	H4-79
R. G. Hollenbeck	ICF KH	G3-17
P. K. Jackson	BHI	X5-53
M. Jaraysi	Ecology - Kennewick	
E. M. Mattlin	RL	A5-15
B. W. Mathis	CHI	X5-53
M. A. Mihalic	BHI	X5-53
L. A. Mihalik	CHI	H4-79
L. R. Miller	CHI	X5-53
N. A. Werdel	RL	H4-83

ADMINISTRATIVE RECORD: 183-H Solar Evaporation Basins Closure, T-1-4 [Care of EDMC, WHC (H6-08)]

BHI Document Control Center; Mail Stop H4-79

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Please send comments on distribution list to Rex Miller (X5-53), 373-9592.